To: Murray, Bill[Murray.Bill@epa.gov]
Cc: Hanley, Jim[Hanley.James@epa.gov]

From: Hestmark, Martin

**Sent:** Wed 8/26/2015 10:00:29 PM

Subject: FW: EXERCISE! EXERCISE! Site Management Plan Notification Call-down EXERCISE!

EXERCISE!

Final Standard Mine Site Management Plan Signature Page.pdf

Great idea. Wo is on the notification plan?

From: Hanley, Jim

Sent: Wednesday, August 26, 2015 3:26 PM

To: Ballegeer, John; Bradley C. Williams; Progess, Christina; Jim Lewis - CDPHE

(jim.lewis@state.co.us); Lanham, Linda; melissa.lamacchia@hdrinc.com; Michael Woodward

(Michael.Woodward@hdrinc.com); Moncino, Keith; richard.johnson@hdrinc.com

Cc: Wharton, Steve; Murray, Bill; Hestmark, Martin

Subject: EXERCISE! EXERCISE! Site Management Plan Notification Call-down EXERCISE!

**EXERCISE!** 

Importance: High

Standard Mine team-leaders and other stakeholders,

I would like HDR to plan and carry out (when separately authorized) a notification exercise according to our Site Management Plan (SMP) to test our readiness before we are allowed to resume construction at the Site. The decision to resume work is reasonably anticipated within the next 96 hours.

The "tabletop exercise" or "emergency management response simulation" will allow us to show our management and community of interest that we are ready for the previously defined contingency events in the SMP. We will learn whether appropriate personnel (our site sentinels) can make the required notifications with the communications equipment on hand within an appropriate response time (one hour) and whether we may want to review the procedures for improvement.

Here is the scenario: Bypass Adit drive encounters more than 20 gpm in a 10-foot probe hole when beginning to drill the next round of blast holes.

Response trigger: Personnel notice or expect significant changes in pH, or visible changes in turbidity, color, or odor of water exiting our last sedimentation pond and release into Elk Creek is imminent.
Pre-planned response: Notify the On-call Water Plant Operator, Crested Butte Water Systems Manager, Project Engineer, Remedial Project Manager, and HWCC Project Manager using Table 1 in the SMP. (One of the improvements we should think about is the precedence order for this call-down list, i.e. who is called first, second, last!)
Exercise response time standard: 60 minutes (Response time will be credited when each of the individuals contacted acknowledge receipt of the notification by text, email, or telephonic reply)
TAKE AWAY OR BOTTOM LINE:
I DON'T WANT YOU TO CONDUCT THE EXERCISE!!! I WANT YOU TO PLAN IT UNTIL I NOTIFY YOU TO IMPLEMENT THE PLAN BY SEPARATE EMAIL.
A well-tested emergency notification procedure is one of the lessons learned from the review of the Gold King incident. Let's incorporate the lesson into our instinctive way of doing business.
Sincerely,
James Hanley
Mining Engineer

Office of Environmental Protection and Remediation

US EPA Region 8

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